

ORIGINAL

FILED
DISTRICT COURT OF GUAM

AUG 15 2007

JEANNE G. QUINATA
Clerk of Court

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF GUAM**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JUNE GONZAL QUINDO, JR.,

Defendant.

CRIMINAL CASE NO. 07-00073

SUPERCEDING INDICTMENT

**DRUG USER IN POSSESSION
OF FIREARMS**

[18 U.S.C. §§ 922(g)(3), 924(a)(2)
and 2] (COUNT I)

**RECEIPT OF FIREARM WITH
OBLITERATED SERIAL NUMBER**

[18 U.S.C. §§ 922(k) and 924(a)(1)(B)]
(COUNT II)

**POSSESSION OF A CONTROLLED
SUBSTANCE WITH INTENT
TO DISTRIBUTE**

[21 U.S.C. §§ 841(a)(1) and 841(b)(B)(vii)]
(COUNT III)

**USE OF A FIREARM IN A CRIME
OF VIOLENCE**

[18 U.S.C. §§ 924(c)(1)(A) and 2]
(COUNT IV)

FORFEITURE ALLEGATION

[21 U.S.C. §§ 841 and 853]
COUNT V

THE GRAND JURY CHARGES:

COUNT I - DRUG USER IN POSSESSION OF FIREARMS

On or about June 26, 2007, in the District of Guam, JUNE GONZAL QUINDO, JR., the

1 defendant, then being an unlawful user of a controlled substance as defined in Title 21, United
2 States Code, Section 802, did knowingly receive firearms described as follows: Glock pistol,
3 model 17, caliber 9 mm, serial number ACL165US, and Raven Arms, model MP-25, caliber 25,
4 serial number obliterated, which had been transported in interstate commerce, in violation of
5 Title 18, United States Code, Sections 922(g)(3), 924(a)(2) and 2.

6
7 **COUNT II - RECEIPT OF FIREARM WITH OBLITERATED SERIAL NUMBER**

8 Between the period of June 26, 2006 and June 26, 2007, in the District of Guam, the
9 defendant JUNE GONZAL QUINDO, JR., knowingly received, in interstate or foreign
10 commerce, a firearm, a Raven Arms, model MP-25, caliber 25, from which the importer or
11 manufacturer's serial number had been obliterated, in violation of Title 18, United States Code,
12 Sections 922(k) and 924(a)(1)(B).

13
14 **COUNT III - POSSESSION OF A CONTROLLED SUBSTANCE
WITH INTENT TO DISTRIBUTE**

15 On or about June 26, 2007, in the District of Guam, the defendant JUNE GONZAL
16 QUINDO, JR., knowingly and intentionally possessed with intent to distribute, one hundred
17 (100) or more marijuana plants, a Schedule I controlled substance, in violation of Title 21,
18 United States Code, Sections 841(a)(1) and 841(b)(B)(vii).

19
20 **COUNT IV - USE OF A FIREARM IN A CRIME OF VIOLENCE**

21 Between the period of June 26, 2006 and June 26, 2007, in the District of Guam, JUNE
22 GONZAL QUINDO, JR., the defendant, unlawfully, knowingly, and wilfully, during and in
23 relation to a crime of violence or drug trafficking crime for which the defendant may be
24 prosecuted in a court of the United States, namely the manufacturing, dispensing, or possessing
25 with intent to manufacture, distribute or dispense a controlled substance, charged in Count III of
26 the is Indictment, used and carried a firearm, a Glock pistol, model 17, caliber 9 mm, serial
27 number ACL165US, and in furtherance of such crimes, possessed such firearm, in violation of
28

1 Title 18, United States Code, Sections 924(c)(1)(A) and 2.

2
3 **COUNT V - FORFEITURE ALLEGATION**

4 1. The allegations of Counts I through IV are hereby realleged and incorporated by
5 reference for the purpose of alleging criminal forfeiture pursuant to Title 21, United States Code
6 Sections 841 and 853.

7 From his engagement in the violations alleged in Counts I through IV of this Indictment,
8 punishable by imprisonment for more than one year, the defendant herein, JUNE GONZAL
9 QUINDO, JR., shall forfeit to the United States, pursuant to Title 21, United States Code,
10 Sections 853(a)(1) and (2), all proceeds defendant obtained, either directly or indirectly, as a
11 result of said violations, to wit:

12 **CASH PROCEEDS**

13 Approximately \$1,220.00 in U.S. currency, in that such sum, in aggregate was received in
14 exchange for the distribution of controlled substances or is traceable thereto.

15 If any of the property described above as being subject to forfeiture, as a result of any act
16 or omission of the defendant JUNE GONZAL QUINDO, JR. :

- 17 (a) cannot be located upon the exercise of due diligence;
18 (b) has been transferred, sold to, or deposited with, a third party;
19 (c) has been placed beyond the jurisdiction of the Court;
20 (d) has been substantially diminished in value; or
21 (e) has been commingled with other property which cannot be subdivided without

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1 difficulty; it is the intent of the United States, pursuant to Title 21, United States Code, Section
2 853(p) to seek forfeiture of any other property of said defendant up to the value of the above
3 forfeitable property.

4 ALL IN VIOLATION OF Title 21, United States Code, Sections 841 and 853.


5 DATED this 15 day of August, 2007.

6 A TRUE BILL.

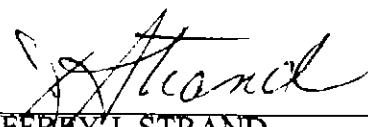
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8 
9 Foreperson

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11 LEONARDO M. RAPADAS
12 United States Attorney
13 Districts of Guam and NMI

14 By:

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ROSETTA SAN NICOLAS
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17 Approved:

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20 First Assistant U.S. Attorney
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